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U.S. DEPARTMENT OF TRANSPORTATION  
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DOCKETS

**U.S. DEPARTMENT OF TRANSPORTATION  
OFFICE OF HEARINGS  
WASHINGTON, D.C.**

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IN THE MATTER OF  
**DHL AIRWAYS, INC.**

DOCKET NO. OST-2002-13089  
(Citizenship Proceeding)

-486

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**MOTION TO QUASH SUBPOENAS DIRECTED TO KLAUS ZUMWINKEL  
AND UWE DOERKEN**

John Rounsaville, Jr.  
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**Mr. Uwe Doerken**

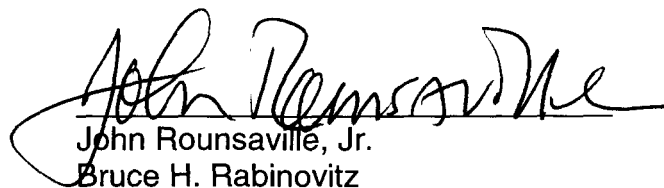
Dated: August 26, 2003

Dr. Klaus Zumwinkel and Mr. Uwe Doerken move pursuant to 14 CFR § 302.25(f) to quash subpoenas seeking their appearance at the hearing in this proceeding. The subpoenas were issued at the behest of United Parcel Service Co. and Federal Express Corporation.

For the reasons set forth in the Memorandum of Law in Support of Motion to Quash Subpoenas Directed to Klaus Zumwinkel and Uwe Doerken, which is incorporated herein by reference, the subpoenas should be quashed in their entirety because they improperly seek irrelevant testimony, are unlawful and unenforceable as a matter of international law, and have been served in a manner that is not authorized by the controlling Statute.

The present Motion consists of this Motion and the attached Memorandum of Law in Support of Motion to Quash Subpoenas Directed to Klaus Zumwinkel and Uwe Doerken.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John Rounsaville, Jr.", is written over a horizontal line.

John Rounsaville, Jr.

Bruce H. Rabinovitz

Todd R. Steggerda

**WILMER, CUTLER & PICKERING**

**COUNSEL FOR:**

**Dr. Klaus Zumwinkel and**

**Mr. Uwe Doerken**

August 26, 2003

**CERTIFICATE OF SERVICE**

I hereby certify that I have served copies of the Motion to Quash Subpoenas Directed to Klaus Zumwinkel and Uwe Doerken this 26th day of August, 2003 to all persons named on the attached service list by causing copies to be sent via email.

\_\_\_\_\_  
Diana R. Neal

DATED: August 26, 2003

DHL Airways, Inc.  
Docket No. OST-2002-13089

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